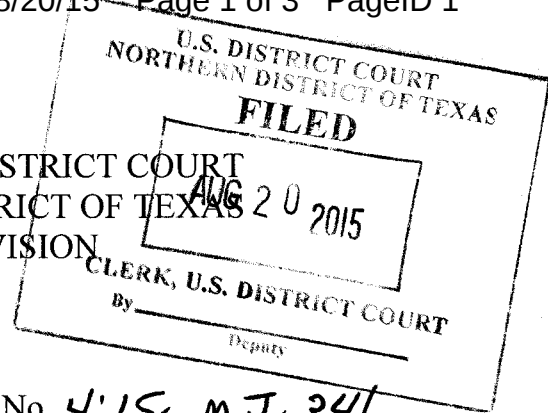


IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION



UNITED STATES OF AMERICA

v.

JON RYAN EVANS (01)

No. 4:15 MJ-341

CRIMINAL COMPLAINT

On or about August 18, 2015, in the Fort Worth Division of the Northern District of Texas, the defendant, **Jon Ryan Evans**, being a person who had been convicted in a court of a crime punishable by imprisonment for a term in excess of one year, that is, a felony offense, did knowingly possess, in and affecting interstate commerce, a firearm, that is, a Colt, model MKIV, .45 caliber pistol, bearing serial number 70B12749; in violation of 18 U.S.C. § 922(g)(1).

I, Special Agent M. Finney, Affiant, under oath, duly state that I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) and that the statements set forth in this affidavit are true and correct to the best of my knowledge:

1. On August 18, 2015, Texas Department of Public Safety (DPS) Agents executed a state search warrant at the business of **Jon Ryan Evans**, also known as Jon Jason Hyre, located at 5115 Stanley Keller Road, Haltom City, Texas, and the residence of **Evans**, located at [redacted] Bella Vino Drive, Fort Worth, Texas for evidence and documents related to the hindering of apprehension and prosecution of a third degree felony.

2. During the course of the search warrants, DPS Agents located a locked gun safe in the garage of the residence. **Evans's** wife, Heather Evans, stated that one firearm contained in the safe belonged to her but she did not know the combination to access the safe.

Evans acknowledged that he knew the combination to the safe and opened the safe for Agents. Located inside the safe were approximately fourteen (14) firearms and numerous rounds of ammunition. Agents also located a loaded Colt, model MKIV, .45 caliber pistol, bearing serial number 70B12749, under the bed in the master bedroom of the residence. Agents did not seize the firearms at that time.

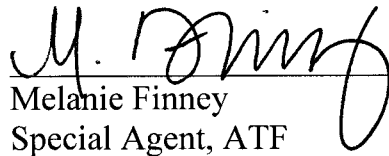
3. During the course of the search warrant at **Evans's** business, Agents located a file folder, which contained a Decree Granting Change of Adult's Name, signed on January 17, 1997, reflecting **Evans's** name change from Jon Jason Hyre to **Jon Evans**. Also located in the file folder was a copy of a Judgment in a Criminal Case, United States District Court, Northern District of Texas, Fort Worth Division, reflecting the felony conviction of Jon Jason Hyre for Trafficking in Motor Vehicles with Obliterated or Altered Vehicle Identification Numbers and the sentencing of Hyre on January 8, 1996 by United States District Court Judge Terry R. Means.

4. On August 18, 2015, at approximately 12:30 pm, DPS Agents returned to **Evans's** residence, located at [redacted] Bella Vino Drive, Fort Worth, Texas and received written and verbal consent to search the residence from Heather Evans. At that time, Agents again located and seized the fourteen (14) firearms from the gun safe located in the garage and the Colt, model MKIV, .45 caliber pistol, bearing serial number 70B12749, from under the bed in the master bedroom.

5. On August 18, 2015, I reviewed the criminal history of Jon Jason Hyre, maintained under FBI number 846913TA0, which reflected the 1994 federal felony conviction. Further, the criminal history reflects both Jon Jason Hyre and **Jon Evans** as names used by **Evans** and linked through fingerprints as one in the same person.

6. On August 20, 2015, ATF Special Agent R. Looper, an Interstate Nexus Expert, reviewed a description of the Colt, model MKIV, .45 caliber pistol, bearing serial number 70B12749, and determined that the firearm was manufactured outside the state of Texas and therefore, would have had to move in, and affect interstate commerce to reach the state of Texas.

7. Based upon the above facts and circumstances, I believe that there is probable cause to believe that **Evans** has violated 18 U.S.C. § 922(g)(1) by unlawfully possessing a firearm after being convicted in a court of a crime punishable by imprisonment for a term exceeding one year.


Melanie Finney
Special Agent, ATF

Sworn to before me and subscribed in my presence, August 20, 2015,
in Fort Worth, Texas, at 2:29 a.m./p.m. (p.m.)


JEFFREY L. CURETON
United States Magistrate Judge